

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TERESA Y. WALTON,

Plaintiff,

v.

EDWARD SLOAN AND ASSOCIATES,  
INC.,

Defendant.

Case No. 2:19-cv-00343-JRG

Honorable Judge Rodney Gilstrap

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME  
TO DESIGNATE LOCAL COUNSEL AND CONTINUE SCHEDULING CONFERENCE**

NOW COMES Plaintiff, TERESA Y. WALTON ("Plaintiff"), through counsel, SULAIMAN LAW GROUP, LTD., pursuant to Fed. R. Civ. P. 6(b), moving the Court to extend time to designate local counsel and continue the scheduling conference. In support thereof, Plaintiff states as follows:

1. On October 18, 2019, Plaintiff filed this instant action against Defendant, Edward Sloan and Associates, Inc. [Dkt. No. 1].
2. On December 12, 2019, the Court issued a Notice of Scheduling Conference for January 28, 2020 [Dkt. No. 9].
3. On January 2, 2020, Plaintiff file her Motion to Appear Telephonically for the Scheduling Conference [Dkt. No. 10].
4. On January 3, 2020, the Court issue an Order denying Plaintiff's request to appear telephonically for the Scheduling Conference and notes that in prior situations, parties often retain local counsel to represent them at the scheduling conference. [Dkt. No. 11].

5. Pursuant to Honorable Judge Gilstrap's Order, Plaintiff is in the process of obtaining local counsel. In fact, Plaintiff has been seeking local counsel to appear at the scheduling conference since January 3, 2020.<sup>1</sup>

6. The search for local counsel has proved to be more difficult than expected.

7. As such, Plaintiff is respectfully seeking an extension through February 26, 2020 to designate local counsel.

8. To keep expense of having the undersigned counsel travel from his office in Lombard, Illinois to appear at the scheduling conference, Plaintiff, a consumer, requests his undersigned counsel to locate local counsel.

9. The undersigned conferred with Defendant's counsel about the relief sought herein, and Defendant has no objection.

9. The request for an extension of time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court extend the deadline to designate local counsel and continue the scheduling conference to February 26, 2020, and for any other relief this Court deems appropriate.

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<sup>1</sup> Counsel for Plaintiff has issued multiple requests to Attorneys on Demand ("AOD") since January 3, 2020, and have been notified that the AOD is still in the process of locating an attorney for the conference.

DATED: January 27, 2020

Respectfully submitted,

**TERESA Y. WALTON**

*/s/ Marwan R. Daher*

Marwan R. Daher, Esq.

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2020, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Texas by using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Marwan R. Daher  
Counsel for Teresa Y. Walton